



INTERNATIONAL ASSOCIATION OF FIRE CHIEFS

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March 25, 2013

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Chairman Genachowski:

On behalf of the International Association of Fire Chiefs (IAFC), I write to express IAFC's view that the deployment of advanced location technologies is critical to the future of emergency calling systems and public safety response capabilities. As the Commission has acknowledged, most recently in its 2011 Third Report and Order on wireless E911, current indoor limitations on location accuracy are a "significant public safety concern" that requires development of technical solutions. With nearly 400,000 E9-1-1 calls made every day through wireless devices, IAFC shares the Commission's concerns.

Progeny and its parent company, NextNav Holdings LLC ("Progeny/NextNav") are reportedly constructing a nationwide position location network using licensed spectrum that was specifically allocated by the Commission for Multilateration Location and Monitoring Services (M-LMS), and are seeking Commission approval to begin commercial service. We further understand that the Commission directed Progeny/NextNav to conduct field testing of the spectrum sharing capabilities of its network in cooperation with other manufacturers which have similar technology and users of unlicensed devices that operate in the 902-928 MHz band, and that your staff is reviewing the results of those field tests along with comments from the public.

In December 2012, a working group of the Commission's Communication Security, Reliability and Interoperability Council ("CSRIC") tested the capabilities of the three vendors having indoor location technologies in order to determine accuracy and reliability in both horizontal and vertical dimensions. The CSRIC Test Report issued March 14, 2013 concluded: "The availability of such functionality would be an important factor in locating indoor callers in urban and dense urban multistory buildings", and further that "Public Safety expects that the standardization, commercial availability and deployment of such technologies are priorities for all stakeholders. Such enhanced functionality could allow for better tracking of first responders, leading to improved safety, resource coordination and service."

IAFC does not specifically endorse any particular location technology or location service provider. However, we do believe indoor technology is critical to first responders and

respectfully urge you to complete your review of the spectrum sharing capabilities of the Progeny/NextNav network in a timely manner. We believe that your review will help facilitate the deployment of indoor technology useful to public safety. IAFC appreciates the Commission's work in this area to promote the safety of public safety on location accuracy.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. Clemmensen', with a stylized, flowing script.

Chief Hank C. Clemmensen
President and Chairman of the Board

Copied: Commissioner Clyburn
 Commissioner McDowell
 Commissioner Rosenworcel
 Commissioner Pai